

## REMARKS

This application has been reviewed in light of the Office Action dated February 4, 2004. Claims 1-3, 5-12, 14-20, 22-29, 31-37, 39-46, and 48-59 are pending in this application. Claims 1, 10, 14, 18, 27, 35, 44, 58, and 59 have been amended to define still more clearly what Applicants regard as their invention. Claims 1, 10, 18, 27, 35, 44, 58, and 59 are in independent form. Favorable reconsideration is requested.

A Replacement Sheet for Figure 5 is enclosed to correct several minor typographical errors.

The Office Action rejected Claims 1-3, 5-12, 14-20, 22-29, 31-37, 39-46, and 48-59 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,032,157 (Tamano et al.) in view of U.S. Patent No. 6,175,829 (Li et al.). Applicants respectfully traverse this rejection.

Applicants submit that amended independent Claims 1, 10, 18, 27, 35, 44, 58, and 59, together with the remaining claims dependent thereon, are patentably distinct from the proposed combination of the cited prior art at least for the following reasons.

The aspect of the present invention set forth in Claim 1 is an image managing apparatus for managing retrievable images that includes an image storage means for storing a plurality of images, a selecting means for selecting a single image from the plurality of images, and an input means for inputting relevant information concerning a plurality of objects within the single image. The relevant information includes a word describing an interrelationship between at least two objects within the image. A memory means stores the relevant information inputted by the input means in association with the single image.

Among other important features of Claim 1 are selecting a single image from the plurality of images, and inputting relevant information concerning a plurality of objects within a single image and storing the relevant information.

Tamano et al., as understood by Applicants, relates to a retrieval method using image information. The Office Action states that Tamano et al. teaches a “memory means for storing the relevant information input by said input means in association with each of the plurality of the objects in the single image” (citing col. 5, lines 11-16, with reference to Figure 2). Applicants submit that this section merely discusses programs to determine and store correspondence between images. Applicants have not found anything in this section, or any other section of Tamano et al., that would teach or suggest inputting relevant information concerning a plurality of objects within a single image and storing the relevant information, as recited in Claim 1. In addition, Applicants submit that nothing has been found in Tamano et al. that would teach or suggest the feature of selecting a single image from the plurality of images, as recited in Claim 1.

Li et al., as understood by Applicants, relates to a method and apparatus for facilitating query reform reformulation. The Office Action states that Li et al. teaches an “input means for inputting relevant information concerning a plurality of objects with a single image, wherein the relevant information includes a word describing an interrelationship between at least two objects within the single image” (citing col. 4, line 64, to col. 5, line 11, with reference to Figs. 1 and 3). This section apparently discusses a query verifier and means of providing feedback to a user. However, Applicants submit that nothing has nothing has been found in this section, or any other section of Li et al., that would teach or suggest inputting relevant information concerning a plurality of objects

within a single image and storing the relevant information, and selecting a single image from the plurality of images, as recited in Claim 1.

Applicants submit that at least for these reasons Claim 1 is patentable over the cited prior art.

Independent Claims 10, 18, 27, 35, 44, 58, and 59 include the same features of inputting relevant information concerning a plurality of objects within a single image and storing the relevant information, and selecting a single image from the plurality of images, as discussed above in connection with Claim 1. Accordingly, Claims 10, 18, 27, 35, 44, 58, and 59 are believed to be patentable for at least the same reasons as discussed above in connection with Claim 1.

This Amendment After Final Action is believed to place this application in condition for allowance and, therefore, its entry is believed proper under 37 C.F.R. § 1.116. Accordingly, entry of this Amendment After Final Action, as an earnest effort to advance prosecution and reduce the number of issues, is respectfully requested. Should the Examiner believe that issues remain outstanding, it is respectfully requested that the Examiner contact Applicants' undersigned attorney in an effort to resolve such issues and advance the case to issue.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and the allowance of the present application.

Applicants' undersigned attorney may be reached in our New York Office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,

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